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January 28, 2015

Via Electronic and First-Class Mail:
Regional Freedom of Information Officer
U.S. EPA, Region 2
290 Broadway, 26th Floor
New York, NY 10007-1866
(212) 637-3668

c/o Caleb Hayes-Deats
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86 Chambers Street, 3rd Floor
New York, NY 10007
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USEPA - REG 2
PAD - FOIA OFFICE

Re: Freedom of Information Act Request: Port Refinery Superfund Site, Rye Brook, NY

To Whom It May Concern:

Pursuant to the Freedom of Information Act, I hereby request the records and documents that comprise the basis for including Universal Metal & Ores, Inc. ("Universal") as a Potentially Responsible Party ("PRP") for the Port Refinery Superfund Site in Rye Brook, NY (the "Site"), including but not limited to the following:

- All deposition transcripts and exhibits in the case of United States of America v. Jane Doe, as Executrix of the Estate of Edmund Barbera, et al., 95 Civ. 8563 (S.D.N.Y.), to the extent that such transcripts and/or exhibits relate to Universal;
- All expert witness reports in the case of United States of America v. Jane Doe, as Executrix of the Estate of Edmund Barbera, et al., 95 Civ. 8563 (S.D.N.Y.), to the extent that any such reports relate to Universal; and
- Documentation of the costs expended by EPA for remediation of the Port Refinery Superfund Site and the dates upon which such costs were expended.

I also hereby request copies of any and all written communications, including any documentation exchanged, between EPA and any other PRPs (or counsel for any other PRPs) for the Port Refinery Superfund Site, to the extent that any such communications and/or documents exchanged relate to Universal.

I agree to pay all costs associated with this request, up to \$100; if fees associated with the response to this request will exceed \$100, please contact me so that I may determine if it is possible to narrow the request. Please contact the undersigned regarding when the requested documents will be available for inspection and copying. In the alternative, please indicate whether it is possible to receive a PDF copy of the requested documents on a disc or flash drive.

Please respond within the time required by law. If any documents are withheld in response to this request, please identify those documents and indicate the reason for which they are being withheld.

Thank you for your assistance in this matter. If you have any questions, please do not hesitate to contact me at (646) 378-7236 or eroggenkamp@sprlaw.com.

Sincerely,


Edward Roggenkamp